



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

November 10, 2014

Colonel Michelle D. Mitchell  
Fort Belvoir Directorate of Public Works  
Environmental and Natural Resources Division  
Re: Real Property Master Plan EIS  
9430 Jackson Loop, Suite 200  
Fort Belvoir, VA 22060-5116

Re: Draft Environmental Impact Statement for Short-Term Projects & Real Property Master Plan Update, Fort Belvoir, Virginia (CEQ #20140257)

Dear Colonel Mitchell:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement (DEIS) for the Short-Term Projects and Real Property Master Plan (RPMP) Update for Fort Belvoir in Virginia.

The RPMP covers Fort Belvoir's 7,682-acre Main Post and the 807-acre Fort Belvoir North Area (FBNA). The purpose of the Proposed Action is to provide Fort Belvoir with an updated master plan that reflects current missions, needs, and conditions and addresses short-term program facility and infrastructure needs. An updated RPMP will allow Fort Belvoir to manage its real property resources in the future in a manner that fully supports its overall mission. Building the short-term projects by 2017 will address outstanding, unmet infrastructure and facility needs. The updated master plan is needed to provide Fort Belvoir with a blueprint for future real property planning through 2030. The Army is proposing to adopt and implement an updated RPMP for Fort Belvoir, to implement the short-term projects identified in the plan by 2017, and eventually to implement the long-term projects identified in the plan from 2018 to 2030.

Three alternatives were evaluated in the DEIS, the No Action Alternative, Alternative 1 – Full Implementation (the Preferred Alternative), Alternative 2 – Modified Long-Term, and Alternative 3 – Modified Short-Term. Alternative 1 assumes that all parts of the RPMP would be approved and implemented. Full implementation would result in a total post workforce of approximately 44,000 by 2017 and 56,000 by 2030. Alternative 2 assumes full implementation



except that there would be no long-term development project on the FBNA (LT 9, a proposed secure campus for 7,500 personnel). Short-term (ST) 40 and ST 52, expansion of the Defense Logistics Agency, would be delayed until the long-term (and become part of LT 10a). Implementing Alternative 2 would result in approximately 43,000 personnel on post by 2017 and 50,000 by 2030. Alternative 3 assumes almost full implementation of the master plan except that implementation of the majority of short-term projects would be delayed from the short-term (2012-2017) to the long-term (2018-2030) and some projects would have fewer personnel than under Alternative 1. Implementing this alternative would result in approximately 40,000 personnel by 2017 and 55,000 by 2030.

As a result of our review of the DEIS, EPA has concerns with the DEIS in that environmental analyses are still pending or inadequate and the threshold of significance used to measure resource impact needs more clarification. Thus, it is not possible to fully assess environmental impacts from the Proposed Action. Areas of specific concern are water resources, biological resources, Environmental Justice, transportation/traffic, hazardous substances/hazardous materials and cumulative impacts. A detailed description of these concerns is presented in the Technical Comments (enclosed) for your consideration. EPA rated the DEIS an EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of this project. A copy of EPA's rating system is enclosed for your information.

Thank you for the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,



Barbara Rudnick  
NEPA Team Leader  
Office of Environmental Programs

Enclosure (2)



## Technical Comments

### **Purpose and Need**

As noted in the DEIS, the updated RPMP will allow Fort Belvoir to manage its real property resources into the future in a manner that fully supports its overall mission and building the short-term projects by 2017 will address outstanding, unmet infrastructure and facility needs. The DEIS also states that “An RPMP will be reviewed annually for change and formally updated at least every 5 years.” Please explain the formal update of the RPMP to take place at least every 5 years. How extensive will the update be and will it be conducted through a NEPA evaluation?

The current DEIS (as the title indicates) addresses Short-Term Projects, but also lists long-term projects and long-term transportation projects to be completed by 2030. Because some of these projects are in the distant future and since resources impacted cannot be accurately identified now or can change by the time project implementation takes place, it would be best to address these projects in a NEPA evaluation. Although it is assumed that additional NEPA analysis would follow for all long-term projects and long-term transportation projects, the FEIS should specify and identify those projects where future NEPA evaluation will be forthcoming. This may be incorporated into Table ES-2, Long-Term (2018-2030) Projects and Table ES-3, Long-Term (2018-2030) Transportation Projects under Status/Comments column just as Table ES-1, Short-Term (FY 2012-2017) Projects and Table 2-3, Short-Term (FY 2012-2017) Transportation Projects notes projects that are completed or in progress.

### **PREFERRED ALTERNATIVE, ALTERNATIVE 1 – FULL IMPLEMENTATION**

It would be beneficial to have an overlay of Figure ES-5, Alternative 1 – Full Implementation with Figure 3.1-2 Fort Belvoir Development Constraints, to better view the Preferred Alternative’s proposed projects in areas designated as Least Suitable for Development, Moderately Suitable for Development and Most Suitable for Development. As with the FBNA, it appears that the Preferred Alternative’s proposed project is located in an area designated as Moderately Suitable for Development. For those areas least suitable or moderately suitable for development where a specific project is planned, a discussion should follow as to why the area was selected, what makes the land moderately suitable or least suitable as well as discuss potential impacts. Although a general discussion is provided on page 3-13, specific reasons applicable to each of the Proposed Action projects should be provided.

### **Long-Term Projects**

As noted on page 2-52, LT 6A – Lower North Post West District, is an alternative site to LT 6, Industrial Area District. However, when viewing these two areas on Figure 2-10, there is a considerable size difference in allotted sites. LT 6 encompasses a large area mass as opposed to LT 6A which is considerably smaller and condensed. Please explain why LT 6 would require several buildings and LT 6A would only involve one building. Since it appears as if LT 6 is near sensitive resources, it seems most environmentally prudent to prefer the LT 6A site over the LT



6 site. Please discuss the need for additional buildings in LT 6 and if LT 6A can suffice for the Army's purpose.

## **THRESHOLD OF SIGNIFICANCE**

EPA questions whether the threshold of significance used to measure resource impacts may underestimate the actual resource loss. The threshold of significance should assess the consequence of the loss to impacted resources. See below for those resources where the threshold of significance may need to be clarified and/or justified.

### **Water Resources**

Page 3-350 states, "Fort Belvoir also has a current VPDES Industrial Stormwater General Permit (no. VAR051080 – expires in June 2014) that specifically covers stormwater runoff from DAAF, and has applied for an industrial stormwater permit for other portions of the installation. Once a new permit is approved, it will cover the entire installation." It is assumed that a new permit has been issued and the FEIS should reflect this.

Table 3.8-4 shows the net increase in impervious surface by watershed for short-term projects; the total net increase in impervious surface would be 88.7 acres. The net increase in impervious surface by watershed for short-term transportation projects would be 3.85 acres, long-term projects would be 33.3 acres, and long-term transportation projects would be 10.4 acres. "The threshold for significance for impacts to watersheds would be if the individual project increased the overall imperviousness of the watershed by more than one percent, and hence the potential for unmitigated stormwater runoff, or the RPMP projects cumulatively increased imperviousness more than two percent, or if the project caused the watershed to cross the 10 to 20 percent impervious cover threshold associated with a degradation of stream quality."

Aside from the Pohick Creek and Pohick Bay watersheds which are less than one percent impervious, the other watersheds on Main Post and FBNA are between 12 to 26 percent impervious cover and the remaining five watersheds (Accotink Bay, Gunston Cove, Accotink Creek, Dogue Creek and Potomac River) already exceed the threshold. Thus, it is assumed that any development (either individually or cumulatively) would increase the imperviousness of these watersheds with the potential to degrade stream quality.

Even with permits, LID, and best management practices, stormwater management on Fort Belvoir is an issue of utmost importance. EPA questions whether the threshold of significance is appropriate to address the size of development proposed. Please explain how the threshold was derived and if it is stringent enough for the degraded watersheds. Since stormwater pollution is a major concern on Fort Belvoir, cumulative impacts of all proposed and future projects should be addressed.



Page 3-354 states, "Belvoir has, or is in the process of establishing over two dozen stream and wetland mitigation sites." Figure 3.8-4 shows these locations and identifies the mitigation sites (as stream or wetland mitigation)." However, it would be helpful to have the mitigation sites described and/or numbered in a table as it is difficult to account for the 24 plus sites on Figure 3.8-4. In addition, it appears as if only one wetland mitigation site was completed. Please confirm and if there are more, please describe.

Page 3-360 states, "Figure 2-9 shows the potential long-term project sites." The correct figure referenced should be Figure 2-10 (not Figure 2-9).

Page 3-364 states, "Based on the GIS and project-specific information, there are approximately 2,700 acres of Chesapeake Bay RPA on the post. A significant impact would result if more than one percent (27 acres) of the Chesapeake Bay RPA were impacted without mitigation." Again, the consequence of the impact should be the determining factor in the threshold of significance. Table 3.8-8 lists the potential short-term projects total impact of 6.231 acres of Chesapeake Bay RPA. The location of this loss should be depicted on a map and the EIS should provide a description and discussion of the impacted resources.

Page 3-366 states that it is possible that LTT 3 (Monitoring for US Route 1 Intersection Improvements at Fairfax County Parkway, Pohick Road, and Belvoir Road) could result in small impacts to the RPA associated with Accotink and Dogue Creeks and their tributaries. Impacts would be determined during project design, and if unavoidable, would be mitigated. Thus, impacts to the RPA is not known yet. It is assumed that subsequent NEPA analysis will follow to account for impacts both individually and cumulatively.

## **BIOLOGICAL RESOURCES**

The following is the threshold of significance for specified resources: Plant Communities and Forest Resources – permanent loss of two percent of the native plant communities; Aquatic Macroinvertebrates/Fish – loss of more than two percent of the available habitat; wildlife – loss of more than two percent of the habitat on post. Rare, Threatened, and Endangered Species and their Habitats – an adverse effect that cannot be resolved with the regulatory agencies through some form of mitigation; Wetlands – in addition to regulatory requirements, cumulatively the action would result in a total loss of wetlands that exceeds more than two percent of the total estimated wetlands area on the installation. Please discuss how the thresholds of significance were determined for biological resources.

The EIS should state if the proposed action for the FBNA would impact the federal- and state-listed threatened small whorled pogonias as Figure 3.9-4 shows a portion of potential habitat near the proposed development.



Page 3-387 states, “The survey of the 300 Area indicated suitable habitat on some of the wooded slopes surrounding the development area (VDCR-DNH, pers. comm., July 16, 2012; Van Alstine, 2013a).” Where is the 300 Area on the South Post and suitable habitat for the small whorled pogonia?

Page 3-394 states, “Projects proposed in and near the area where wood turtles may be found should include surveys for their presence.” The FEIS should be more definitive and instead of “should” direct that it “will” include surveys for the presence of wood turtles.

Figure 3.9.3 shows Partners-in Flight Concern Species Habitat and a number of the proposed projects are within the Partners-in-Flight buffer. Identify and discuss the impact to this resource from Proposed Action projects.

### Wetlands

Page 3-396 states, there are approximately 1,200 acres of wetlands on Fort Belvoir’s Main Post which is approximately 12 percent of the land area. The predominant wetland type on Fort Belvoir is Palustrine forested wetlands. The FBNA supports approximately 27 acres of wetlands. Of the Long-Term Projects, only LT 9 (FBNA District) has the potential to impact streams (based on planning-level mapping). Of the Long-Term Transportation projects, LTT 2 (Fairfax County Parkway/John J. Kingman Road Intersections and NMUSA Entrance) would cross two major tributaries to Accotink Creek, Project LTT 3 (Intersection Improvements) could also potentially impact wetlands and streams associated with tributaries to Accotink Creek.

As noted on page 3-416, the threshold of significance for impacts on wetlands would be those thresholds that would trigger the need for an individual federal permit under Section 404 of the Clean Water Act (i.e., loss of more than one acre of non-tidal wetland or open water, or 2,000 linear feet of stream), or the need for an individual state permit under the Virginia Wetlands Protection Program (more than two acres of wetland or open water and 1,500-linear feet of stream, for any single and complete project). Cumulatively, the threshold for significant impacts would be if the total loss of wetlands resulting from the proposed RPMP exceeded more than two percent of the total estimated wetland area on the installation.”

It is assumed and suggested that the Long-Term Projects and Long-Term Transportation Projects would address wetlands and streams in subsequent NEPA analyses. EPA’s mandates include the preservation of wetlands environmentally significant values and functions. For those projects yet to be planned or implemented, impacts to wetlands should be avoided or minimized whenever possible. Even though the proposed Short-Term Projects and Short-Term Transportation Projects individually/cumulatively would not approach the threshold of significance for wetlands and streams, the approximate wetland impact from Long-Term Projects and Long-Term Transportation Projects is not yet known. It is important to note that the two percent of the total estimated wetland area threshold would be a considerable loss that could



have detrimental effects on resources. Please discuss how this percentage was derived and how any impacts to wetlands/streams would affect resources.

### **Forest Resources**

Page 4-14 states that implementation of the Proposed Action projects would result in the loss of a maximum of approximately 107 acres of forest resources, or about 1.9 percent of the on-post forest resources. The loss of approximately 107 acres of forest resources is a considerable sum despite that it is slightly less than the 2 percent threshold of significance. The EIS should address the resource loss in terms of the consequence of its impact on wildlife/avian habitat, water protection and groundwater recharge areas, etc.

Page 3-422 states that the Fort Belvoir Tree Removal and Protection policy provides for several mitigation options, including replacing the lost trees at a 2 to 1 ratio or an "out-of-kind" mitigation action such as stream restoration or Partners-In-Flight (PIF) habitat enhancement. Fort Belvoir proposes to mitigate the cumulative impacts on natural resources of implementing 52 short-term facility projects and 7 short-term transportation projects by adding areas of land to Fort Belvoir's protected Forest and Wildlife Corridor (FWC) and Accotink Bay Wildlife Refuge. What is the acreage of mitigation proposed?

### **Wildlife**

Page 3-409 states, "The short-term projects included in Alternative 1 for the RPMP would together cause the loss of 0.34 acres of the FWC (Table 3.9.3), 59.2 acres of PIF habitat (Table 3.9.3), and 61.3 acres of forested habitat (Table 3.9-2). The impacts to the FWC will be replaced through the mitigation required for that project." Please describe the mitigation required as well as quantify and identify location, etc. "The 59.2 acres is 1.4 percent of the PIF on the post (approximately 4,200 acres), while the 61.3 acres is 1.1 percent of the forested habitat on the post. These impacts would thus be a less than significant adverse effect." It is not clear how the threshold of significance was derived and there is concern with the quantity of resources lost and its impact to natural resources, wildlife habitat and PIF, etc. The threshold of significance should be based on the consequence of the impacted resources and mitigation should be developed to compensate and directly mitigate the losses resulting from the Proposed Action projects.

Like Table 3.9-3, Potential Impacts to PIF Habitat and the Forest and Wildlife Corridor, (Short-Term Projects), there should be a table for Long-Term Projects to assess the potential impacts to Partners-in Flight Acreage and Forest Wildlife Corridor Acreage.



### **Rare, Threatened, and Endangered Species and Their Habitats**

Page 3-412 states, "For state-listed species, the threshold for significance would be loss of more than two percent of the species' habitat on the installation." The DEIS did not quantify state-listed species habitat found on the installation. Again, consequence of impact should be the determining factor as opposed to the two percent rule. It seems that any loss of a state-listed species habitat would be significant and would certainly be at the discretion of the state agency.

In reference to the wood turtle, a state-listed species, Alternative 1 has the potential to eliminate 28.25 acres of habitat out of a total of 1,972 acres on the post for short-term projects. Two long-term transportation improvement projects have the potential to impact several acres of wood turtle habitat. Since long-term transportation projects are in the early planning process, the exact impact is not known; thus it is likely that this number can change. It is likely that there will be an additional impact to wood turtle habitat increasing the 28.25 acres of habitat impact. Please discuss the potential increased cumulative impact to the wood turtle.

In reference to Project ST 23 (NGA Canine Training/Rest Facility) and LT 9 (FBNA District) where project sites abut suitable habitat for the threatened small whorled pogonias (even though no individuals have been found), discuss how this would be addressed. Is this acceptable to impact suitable habitat? Consultation with the USFWS should be arranged early in the planning process to discuss and address mitigation, etc.

Table 3.9-6, Summary of Biological Resources Impacts by Alternative, would be more informative if it quantified the resource impacts and mitigation proposed.

### **Historic Resources**

Page 3-35 states, "The planning and design of short-term projects that would occur closest to Fort Belvoir's boundaries – the NMUSA projects (ST 17, 26-Hole Golf Course Reconfiguration; ST 18, NMUSA Roads and Infrastructure; ST 27, NMUSA and its subsequent phases, ST 34, 38, 41; and associated projects); and ST 49, 911<sup>th</sup> Engineering Company Operations Compels – would incorporate site design measures to minimize or eliminate visual and noise intrusions on nearby off-post land uses (including Accotink Village in the case of ST 49)." Page 3-32 states that two projects ST 50, Vehicle Maintenance Shop and ST 51, Information Systems Facility for NEC would be built on sites designated as Industrial under the Future Land Use Plan but located adjacent to Residential areas in the Fort Belvoir Historic District. The DEIS did not discuss within the Historic and Cultural Resources Section (3.3), if these two projects would have a visual impact on the residential areas in the Fort Belvoir Historic District and, if so, what mitigation, if any, could be incorporated into the project plan. Please discuss.





As mentioned on page 3-168, Fort Belvoir would work with the Virginia SHPO and appropriate consulting parties to develop mitigation measures and execute an MOA, if the Proposed Action projects would constitute an adverse effect. It is important to note that early involvement with the Virginia SHPO in the planning phase is strongly suggested to avoid any negative impacts to resources.

### **Environmental Justice**

It would be helpful to more clearly define the study area for the project, and to include all of the census tracts in the study area in the Environmental Justice (EJ) assessment. In some portions of the document, mention is made of impacts in Maryland associated with school aged populations, for example. If these populations are potentially impacted, they should be included in the assessment. Additionally, it seems reasonable to consider areas that may be effected by indirect and/or cumulative impacts around the site.

If areas in Maryland are impacted by the site, then demographic data for Maryland should be included as well.

County level demographic data would be a useful inclusion for purposes of comparison in this document.

### **Protection of Children**

Table 3.2-15, Concentrations of Children, indicates four block groups with a very high percentage of children on the Main Post. As page 3-75 states, "Of the 26 block groups in the Fort Belvoir affected area, 17 of them, or over two-thirds, had a higher percentage of children than the children under 18 population recorded for the state."

Pages 3-81 and 3-83 states that, implementation of Alternative 1 short-term projects and long-term projects would individually and cumulatively have less than significant adverse impacts on population. As the discussion continues to page 3-96, it is not clear how this determination was derived and if there was specific consideration to impacts on children that could result from the Proposed Action projects. For instance, in the discussion on long-term projects on page 3-96, there is yet no solution to mitigate for the anticipated negative impacts of traffic on the installation. Although the Army has taken precautions for the safety of on-post children by using fencing, limiting access to certain areas and providing adult supervision, it is important to discuss in terms of the Proposed Action projects and their proximity to block groups with high percentages of children, both on-post and off-post (i.e., the training compound, 911<sup>th</sup> Engineering Company Operations Complex, vehicle maintenance shop, etc.)

Although the DEIS states that "no disproportionately high and adverse human health or environmental effects on minority populations and low-income populations would occur," the



EIS must provide justification and/or data to support this claim to allow for an understanding of how the conclusion was derived.

### **Transportation and Traffic**

In reference to Table 3.4-6 (2017 No-Build and 2017 Alternative 1 Operational Characteristics – Fort Belvoir Intersections) seven intersections noted to produce increased delays referenced on page 2-239 does not accurately reflect Table 3.4-6. For instance, Site 3 – Kingman Road at Beulah Street is projected to change from LOS C to LOS D during the PM peak hours only (not during AM peak hours). Site 4 – Kingman Road at Gunston Road is projected to change from LOS D (not A) to LOS C during the AM peak hour. Site 6 – Gunston Road at Abbot Road is not projected to change in the AM (remains at LOS C) and is not projected to change in the PM (remains at LOS D). Site 7 – Gunston Road at Goethals Road is projected to change from LOS C (not A) to LOS D in the AM and remain the same at LOS B during the PM peak hour. Site 8 – Gunston Road at First Street is projected to change from LOS C (not B) to LOS D during the PM peak hour. Site 18 – Belvoir Road at 16<sup>th</sup> Street; the two-way stop sign operation is projected to change from LOS B (not A) to LOS C (not D) during the PM peak hour. Please make changes to narrative on page 3-239.

Page 3-267, Table 3.4-10, Recommended Long-Term (2018-2030) Transportation Improvements, lists recommended transportation improvement projects. It is important to reiterate throughout the DEIS, but especially when discussing long-term projects (2018-2030) that future projects may be addressed in additional NEPA evaluations since landscape and conditions may be very different from what the current DEIS addresses.

### **Noise**

Page 3-313 states, “Regardless of the ultimate size or location of any standby generators required for the long-term projects, long-term effects, while adverse, would be less than significant and mitigation measures would be used to lessen generator noise.” Please specify mitigation measures that would lessen generator noise.

### **Geology, Topography, and Soils**

Page 3-327 states that approximately 1,855 acres are classified as prime farmland on Main Post and an additional 1,545 acres are classified as farmlands of statewide importance. “While the farmland designations are based strictly on soil characteristics and do not depend on a history of current or past agricultural use, the applicability of protection of these lands under the Farmland Protection Policy Act is contingent on the adjacent land uses and history of production.” In addition, “Former farmlands within Belvoir were committed to military use long before passage of the Farmland Protection Policy Act; these lands have not been in production for over 50 years. Therefore, while some soil types are classified as prime farmlands or



farmlands of statewide importance, recent land uses within the facility are not consistent with prime farmland or farmland of statewide importance designations.”

EPA appreciates the Army’s discussion and approach to prime farmland and farmlands of statewide importance. However, EPA questions whether these efforts should be coordinated with the Natural Resources Conservation Service (NRCS) or USDA Service Center. It is understood that impacts to prime farmland or farmland of statewide importance should be avoided. However, if this is not possible, the EIS should explain the implications of developing the prime farmland and farmland with statewide importance with respect to the Farmland Protection Policy Act as well as describe the mitigation measures for those impacts. Projects may be subject to the Farmland Protection Policy Act requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a Federal agency or with assistance from a Federal agency. Thus, the Army may need to coordinate with the NRCS.

### **Utilities**

Page 3-443 states, “Redevelopment of the North Post Town Center and development at the PX/Commissary (ST 1, 16, 25, and 28) would require extension or replacement of the water distribution systems in these areas.” Long-term projects would require extension of the water distribution systems as well as abandoning existing lines. The DEIS did not discuss if resources would be impacted by this work. Please discuss. In addition, extension of the sanitary sewage collection system may be required. Please discuss if resources will be impacted.

### **Hazardous Substances and Hazardous Materials**

ST 14, Regional Stormwater Management Facility, in Table ES-1 states that the proposed site requires environmental remediation. Page 2-30 states, “Based on previously-completed engineering and soils testing it has been determined that remediation is required before the site can be developed.” Please describe the kind and extent of contamination, potential resources impacted and history of site.

As noted in Appendix H, Hazardous Substances and Hazardous Materials, some of the project areas identified in maps are located on restricted areas. Some projects that appear to be located on restricted areas are: ST 19 (US Army Intelligence and Security Command (INSCOM) Headquarters Expansion, Phase 1, ST 26 (INSCOM HQ Expansion, Phase 2), ST 33 (INSCOM HQ Expansion, Phase 3), ST 46 (NSCOM HQ Expansion, Phase 4), LT 1 (Lower North Post District). Please discuss projects either on or very near restricted areas and potential impacts, include area size, reason for restriction, area history, potential contamination and relevant information on impacts that can result from the Proposed Action. Any precautionary restrictions to activities should be discussed as well as any potential interference of proposed activities or cleanup should be considered.



Page 3-308 states. "Standby generators would be the only operational noise source associated with Alternative 1." In addition, "Although the generators would be enclosed, engine intakes and exhausts may be open to the outdoors, and the units may be audible to nearby noise-sensitive areas." EPA questions the safety of generators that are enclosed. Even with exhausts open to the outdoors, there is still risk to carbon monoxide? What safety precautions would be in place other than the exhausts to prevent exposure from carbon monoxide poisoning? Opening doors and windows or using exhaust fans will not prevent carbon monoxide build-up.

Page 3-327 states, "A portion of the Codorus silt loam, Codorus and Hatboro soils, and Urban Land soils in Fairfax County are mapped on top of asbestos-containing parent material (greenstone bedrock)." Has any exposure risk been identified or if work is done in the area? If any issues are identified, mapping should be made distinct.

ST 24 is the proposed Fairfax County School Expansion and Figure 3.11-3 shows a petroleum storage area in the same area. Table 3.11-2 (Short-Term Project Sites with Potential Hazardous Material and Hazardous Waste) notes that the two underground petroleum storage areas were removed and permanently out of use. Please discuss the surrounding area, soils, etc and if there is a potential for chemical exposure to children. Discuss if soils were sampled at time of closure. If so, what were the results of sampling? If sampling did not occur, will soils be sampled to ensure safety of end user (children)?

Page 3-471 states. "Ten sites will require additional actions with regard to soil or groundwater contamination in accordance with CERCLA." The EIS should identify these ten sites in relation to the Proposed Action projects as well as describe the contamination (extent, chemical, size, etc.) and potential impacts.

### **Cumulative Impacts**

The impacts from the Proposed Action (short-term projects and short-term transportation projects), many of which have been completed, combined with future long-term projects and long-term transportation projects) in addition to 2040+ Development Parcels (as noted in Figure 2-3) raises concerns with long-term cumulative impacts on Fort Belvoir resources. The amount of development proposed and projected into 2040 can result in considerable cumulative impacts. Since EPA questions the process for deriving at the threshold of significance for some resources, EPA is concerned that impacts are more significant than the DEIS has concluded. Additional discussion or justification of the threshold of significance seems warranted. Future NEPA analysis on long-term projects, long-term transportation projects, and additional future development would be a means of assessing impacts to resources.



### Miscellaneous

Shouldn't LT 10, Defense Logistics Agency/Intelligence and Security Command District (EIS Alternative 3) be listed in Table 2-4, Long-Term (2018-2030) Projects?

Table 3.1-3, Current and Future off-Post Development, lists Project Number 5, Accotink Village as a Development Type of "office". However, the description states that up to 470 multi-family units with some single-family attached housing is proposed. Similarly, Project Number 9, Kingstowne Town Center lists the Development Type as "retail", but the description lists 6,300 residences as proposed development. Thus, "residential" should be added to the Development Type. The EIS should discuss how this proposed Off-Post Development will add to the cumulative impact on roads, communities, and noise and air quality with particular attention to those projects very close to the Fort Belvoir property boundary.

Page 3-31 states, "Regulating plans would be implemented for areas where substantial redevelopment and/or growth is anticipated (US Army, 2014b). The proposed planning districts and areas for which regulating plans would be implemented are illustrated in Figure 3.1-6. The individual regulating plans would govern horizontal and vertical development patterns that would accommodate the type of growth that is anticipated to result from the full implementation of Alternative 1." Figure 3.1-6 depicts "Regulating Plan Areas". Please describe what the Regulating Plan Areas are and how they will be managed, what they encompass, and how these areas differ from other areas on-post. What kind of restrictions, if any, would be placed upon these areas and how will the plans support and protect environmental resources?



